



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-5

Walter L. Smitherman, Treasurer
Mississippi Power Company Federal PAC
A/K/A/ MS Pwr Co. Employees' Comm.
for Responsible Federal Government
2992 West Beach Boulevard
Gulfport, MS 39502

FEB 23 2001

Identification Number: C00144147

Reference: April Monthly (3/1/99-3/31/99), May Monthly (4/1/99-4/30/99), June Monthly (5/1/99-5/31/99), July Monthly (6/1/99-6/30/99), August Monthly (7/1/99-7/31/99), October Monthly (9/1/99-9/30/99), November Monthly (10/1/99-10/31/99) and Year End (12/1/99-12/31/99) Reports

Dear Mr. Smitherman:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

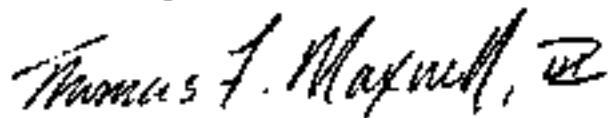
-Be advised that you have used an incorrect committee identification number on the Summary Page of your report(s). Please file all future reports and correspondence using your correct identification number, C00144147, to avoid potential errors in entering your reports onto the public record.

-Schedule A supporting Line 11(a)(i) of your report discloses contributions received through what appears to be a payroll deduction plan. Please amend your report to disclose the amount deducted per pay period. 11 CFR §104.8(b). Please refer to the enclosed sample of properly reported payroll deductions.

-Please amend Schedule B supporting Line 23 by providing the office sought (House, Senate or President) for each contribution made. 11 CFR §104.3(b)(3)(ii) and (v)

Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas F. Maxwell, III".

Thomas F. Maxwell, III
Reports Analyst
Reports Analysis Division

PAYROLL DEDUCTIONS

SCHEDULE A ITEMIZED RECEIPTS		Use separate columns for each category of the Contributed Summary Page		PAGE <u>OF</u>
Contributions from Individuals				FORM LINE NUMBER 11(a)(1)
<small>All information listed on such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.</small>				
NAME OF COMMITTEE OR PAC National Organization PAC C00000001				
a. Full Name, Mailing Address and ZIP Code Anne Sullivan 211 State Street City, State ZIP Receipt For <input type="checkbox"/> Payroll <input checked="" type="checkbox"/> Salaried <input type="checkbox"/> Other (Specify)		Name of Employer National Organization, Inc. Position Branch Manager Average Contributions > \$ 100.00	Date Received 8/19/94 Payroll Deduction \$200.00 (\$100 biweekly)	Amount of Each Receipt for Period \$200.00
b. Full Name, Mailing Address and ZIP Code Rodney Stover 881 Hazelbury Road City, State ZIP Receipt For <input type="checkbox"/> Payroll <input type="checkbox"/> Salaried <input checked="" type="checkbox"/> Other (Specify)		Name of Employer National Organization, Inc. Position Vice President Average Contributions > \$ 300.00	Date Received 8/19/94 Payroll Deduction \$120.00 (\$60 biweekly)	Amount of Each Receipt for Period \$120.00

Itemize payroll deductions only after they have exceeded \$200 per calendar year from an individual.

Payroll Deductions

Once an individual's deductions aggregate over \$200 in a calendar year, report the total amount deducted from the donor's paychecks during the reporting period on Schedule A. In parentheses indicate the amount that was deducted each pay period. Instead of stating a specific date of receipt, write "payroll deduction" under "Date." The other itemized information, including the year-to-date total, must be completed for each donor. 104.8(b).

EXAMPLE: During an election year, a corporate manager authorizes her employer to deduct \$15 per pay period (each pay period is two weeks) for the company's SSF. The SSF, which files FEC reports on a quarterly schedule, includes the manager's first-quarter contributions (\$90 for six pay periods) as "unitemized contributions" on Line 11(a)(1) in the April quarterly report.

By June 30 (the closing date for the July quarterly report), 13 pay periods have passed, and the manager's aggregate contributions are \$195—still below the \$200 itemization threshold. The manager's second-quarter contributions again are included in "unitemized contributions" in the July report.

By September 30 (the closing date for the October quarterly report), 19 pay periods have passed, and the manager's contributions reach \$285. Now the committee itemizes the total contributions received from the manager during the third quarter (\$90), providing the year-to-date total in the appropriate space. (See Item A in the illustration above.)

IN-KIND CONTRIBUTIONS

SCHEDULE A ITEMIZED RECEIPTS		Use separate columns for each category of the Contributed Summary Page		PAGE <u>OF</u>
Contributions from Individuals				FORM LINE NUMBER 11(a)(1)
<small>All information listed on such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.</small>				
NAME OF COMMITTEE OR PAC National Organization PAC C00000001				
a. Full Name, Mailing Address and ZIP Code Martin L. Krebs 4 River Road City, State ZIP Receipt For <input type="checkbox"/> Payroll <input type="checkbox"/> Salaried <input type="checkbox"/> Other (Specify)		Name of Employer National Organization, Inc. Position Chairman Average Contributions > \$ 1,000.00	Date Received 8/19/94 Payroll Deduction \$3,000.00 (\$100 biweekly) (\$100 weekly)	Amount of Each Receipt for Period \$3,000.00

SCHEDULE B ITEMIZED EXPENDITURES		Use separate columns for each category of the Contributed Summary Page		PAGE <u>OF</u>
Operating Expenditures/Other: Federal				FORM LINE NUMBER 21(b)
<small>All information listed on such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.</small>				
NAME OF COMMITTEE OR PAC National Organization PAC C00000001				
a. Full Name, Mailing Address and ZIP Code Martin L. Krebs 4 River Road City, State ZIP		Number of Contributors 20/100 prior Contribution for <input type="checkbox"/> Payroll <input type="checkbox"/> Salaried <input checked="" type="checkbox"/> Other (Specify)	Date Received 8/19/94 Payroll Deduction \$3,000.00 (\$100 biweekly CONTRIBUTION)	Amount of Each Expenditure This Period \$3,000.00

Itemize in-kind contributions on both Schedules A and B so as not to inflate the cash-on-hand amount.

In-Kind Contributions

When determining whether to itemize an in-kind contribution, follow the same guidelines listed above under "When to Itemize Receipts." See page 8 for information on how to determine the dollar value of an in-kind contribution.

In addition, add the value of the in-kind contribution to the operating expenditures total on Line 21(b) (in order to avoid inflating the cash-on-hand amount). 104.13(a)(2).

If the in-kind contribution must be itemized on Schedule A, then it must also be itemized on a Schedule B for operating expenditures. See the illustration at left.